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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

TODD YUKUTAKE and DAVID)
KIKUKAWA)
)
Plaintiffs,)
)
v.)
CLARE E.CONNORS, in her) PLAINTIFFS' SEPARATE CONCISE
Official Capacity as the Attorney) STATEMENT OF FACTS IN SUPPORT
General of the State of Hawaii) OF MOTION FOR SUMMARY JUDGM-
and the CITY and COUNTY) ENT; DECLARATION OF COUNSEL;
OF HONOLULU) CERTIFICATE OF SERVICE
)
)
Defendants.) TRIAL: January 12, 2021 9AM
) JUDGE: Hon. J. Michael Seabright
) HEARING DATE: N/A

**PLAINTIFFS' SEPARATE CONCISE STATEMENT OF FACTS IN
SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

In accordance with Rule 56.1 of the Local Rules for the United States District Court for the District of Hawaii, Plaintiffs Todd Yukutake and David Kikukawa submit their concise statement of undisputed facts in support of their concurrently-filed Motion for Summary Judgment.

FACT	EVIDENTIARY SUPPORT
1. H.R.S. § 134-2(e) invalidates a permit to acquire a handgun after ten days.	<i>See</i> H.R.S. § 134-2(e).
2. H.R.S. § 134-3 requires in person registration of handguns.	<i>See</i> H.R.S. § 134-3; <i>See also</i> Defendant's Response to Request for Admission No. 4, Exhibit "D". <i>See also</i> Defendant's Response to Interrogatories No. 5, Exhibit "A".
3. Plaintiff Todd Yukutake is unable to take personally owned firearms on federal property.	<i>See</i> Verified Complaint, ¶ 54.
4. Plaintiff Yukutake must take off work to register firearms.	<i>See</i> Verified Complaint, ¶ 54; ¶ 58
5. Plaintiff David Kikukawa must take time off work to register handguns.	<i>See</i> Verified Complaint, ¶ 71-72.
6. Plaintiff Kikukawa stated that it is often difficult for him to take off from work and when he does, he either has to use personal time or a vacation day to take off.	<i>See</i> Verified Complaint, ¶ 73.
7. HRS § 846-2.7(a) and HRS § 846-2.7(b)(43) mandates entry of firearm purchasers in the FBI's rap back program.	<i>See</i> HRS § 846-2.7(a) and HRS § 846-2.7(b)(43).

<p>8. Rap back is a “service of the [FBI] that provides continuous criminal record monitoring ... and notifies them when an individual subject to a criminal history record check is arrested for a criminal offense anywhere in the country.”</p>	<p><i>See Exhibit “B”, p. 1 (SB 2954, signed into law on 6/22/2016).</i></p>
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Dated: July 20, 2020

/s/ Alan Alexander Beck
 Alan Alexander Beck

/s/ Stephen D. Stamboulieh
 Stephen D. Stamboulieh
**Admitted Pro Hac Vice*

Attorneys for Plaintiffs